CONESTOGA-ROVERS
& ASSOCIATES

8615 W. Bryn Mawr Avenue, Chicago, IL 60631-3501
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

April 30, 2014 Reference No. 038443-14

Ms. Leslie Patterson
Remedial Project Manager
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Mail Code SR-6J
Chicago, Illinois
60604

Dear Ms. Patterson:

Re: Revised Operable Unit Two Remedial Investigations and Feasibility Study Work Plan
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)

Please find attached the revised Remedial Investigation and Feasibility Study (RI/FS) Work Plan (Work Plan) for Operable Unit Two (OU2) at the Site. Conestoga-Rovers & Associates (CRA) has prepared this letter on behalf of the Respondents to the Administrative Settlement Agreement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) of the Site, Docket No. V-W-06-C-852 (Respondents).

The Respondents have revised the OU2 RI/FS Work Plan based on comments received from the United States Environmental Protection Agency (USEPA) in a letter dated April 9, 2014. As discussed during the telephone calls between USEPA and CRA on April 11 and 30, 2014 and the conference call between USEPA, the Respondents, Ohio Environmental Protection Agency (Ohio EPA), and CRA on April 24, 2014, there are comments and requested changes that have not been directly addressed in the revised OU2 RI/FS Work Plan.

Comments and requested changes that have not been addressed in the revised OU2 RI/FS Report are repeated in italics below followed by the rationale for not incorporating the requested changes.

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USEPA Comments 6 and 14.
P.13, PP 1, sentence 2: Replace the word "incomplete" with "potentially complete" because it is not an incomplete exposure pathway if mitigation was warranted.

The comments refer to the statement in the OU2 RI/FS Work Plan that the vapor intrusion exposure pathway is incomplete with respect to vapor intrusion in Building 24, which is located at 2215 East River Road. CRA collected indoor air samples from Building 24 in March and August 2012, September 2013, and February 2014. Concentrations of all parameters have consistently been less than applicable indoor air screening levels. Therefore, the vapor intrusion pathway is incomplete at Building 24 and mitigation was not warranted. However, concentrations of trichloroethylene (TCE) in sub-slab samples collected from beneath Building 24 have exceeded applicable screening levels. As a precaution to mitigate against the possibility of future vapor intrusion risks associated with the sub-slab TCE concentrations, the Respondents proactively installed a sub-slab depressurization system in Building 24. As agreed during the April 24 conference call, because the vapor intrusion pathway is not considered complete for Building 24, the Respondents have not made the requested change.

USEPA Comment 19.
In the event that an acceptable location for upgradient background sediment samples cannot be determined, CRA can refer to Ohio EPA's Sediment Reference Values (SRVs), which can be found in Table 2 of "Ohio Specific Sediment Reference Values", (Attachment H to Chapter 3, "Guidance for Conducting Ecological Risk Assessments") Ohio EPA, DERR-00-RR-031, February 2003. http://www.epa.state.oh.us/derr/rules/RR-031.pdf.

In the *Guidance for Conducting Ecological Risk Assessments* cited above, Ohio EPA states that "[s]ediment samples were taken from reference areas, also called least impacted site [*sic*]" and further that "[t]hese reference areas were selected as being representative of least impacted conditions in the watersheds for which they serve as models." Given the highly industrialized nature of the area immediately upstream of the Site, it is likely that the sediment in the Great Miami River immediately upstream of the Site is not typical of a "least impacted site". For example, in Ohio EPA's 2014 Sport Fish Consumption Advisory Booklet, Ohio EPA recommends limiting consumption of fish taken from the GMR upstream of the Site due to the presence of elevated concentrations of PCBs and mercury. Therefore, the Ohio EPA SRVs would not provide an accurate basis for comparison in determining whether contaminants originating from the Site have resulted in impacts to the GMR sediment adjacent to and downgradient of the Site. Therefore, as discussed during the April 11, 2014 telephone call, the Respondents propose not

to use the Ohio EPA SRVs as background concentrations. CRA notes that the link provided appears to no longer be active and the *Guidance for Conducting Ecological Risk Assessments* appears to have been revised in April 2008.

USEPA Comment 40.
DQO Table 3.2 (Groundwater). Step 7 states that one groundwater sample will be collected from the bottom of any boring where groundwater is encountered using a temporary well screen. This activity is missing from the text of the work plan, and should be included in the groundwater investigation section.

Respondents removed the text in question in Step 7 of DQO Table 3.2. In accordance with conference call discussions between USEPA and the Respondents, the OU2 groundwater investigation will include the installation of perimeter groundwater monitoring wells to investigate site-related groundwater contamination and potential impacts to off-Site areas. The OU2 groundwater investigation will also consist of locations that are proposed based on the analytical results of the proposed Phase 1A OU2 Soil and Fill Investigation, as well as the analytical results of Phase 1A of the Groundwater and Data Gap Investigation, which was completed in 2013 and Phase 2A of the Groundwater and Data Gap Investigation, which has yet to be completed. As the scope of the OU2 groundwater investigation is heavily dependent on the results of the OU2 Soil and Fill Investigation and Phase 2A of the Groundwater and Data Gap Investigation, the Respondents have not included a defined scope of work in the OU2 RI/FS Work Plan. The Respondents will advance boreholes and collect groundwater samples in areas of potentially unacceptable risks (i.e., unsaturated soil contaminants of concern (COCs) are present at concentrations greater than USEPA soil screening levels for groundwater protection or Ohio EPA leach-based soil values). This process will enable the Respondents to focus the groundwater investigation in areas of potentially higher risk.

USEPA Comment 52.
Add a table for VI screening levels (VISLs) in groundwater and soil, and integrate VISLs for groundwater throughout the report and appendices.

Respondents added Table D.6, which specifies VISLs in groundwater. *OSWER Final Guidance for Assessing and Mitigating the Vapor Intrusion Pathway from Subsurface Sources to Indoor Air* (USEPA, April 2013) states, "The VISLs for human health protection also include subsurface screening levels for comparison to sub-slab soil gas, "near-source" soil gas, and groundwater sampling results". As discussed during our telephone conversation on April 30, 2014, because

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soil VISLs were not included in the USEPA VISL calculator, the Respondents have not included soil VISLs in the OU2 RI/FS Work Plan. The Respondents understand that USEPA intended the comment to refer to groundwater only.

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Adam Loney

AL/cb/14
Encl.

cc: (all by pdf) Wendell Barner, Barner Consulting
Tim Hoffman, Dinsmore & Shohl
Robin Lunn, Neal, Gerber & Eisenberg
Bryan Heath, NCR
Scott Blackhurst, Kelsey Hayes Company
Madelyn Smith, Ohio EPA
Ken Brown, ITW
Jim Campbell, EMI
Wray Blattner, Thompson Hine